

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHARLOTTE BENNETT,

Plaintiff,

- against -

ANDREW M. CUOMO *et al.*,

Defendants.

No. 1:22-cv-07846 (VSB) (KHP)

OBJECTION TO SUBPOENA

Nonparty Madeline Cuomo objects to the subpoena dated August 15, 2023 on the following grounds:

1. The subpoena is not reasonably calculated to lead to discoverable information.
2. The subpoena is unduly broad and burdensome.
3. The discovery sought is unreasonably cumulative and duplicative, and can be obtained from some other source that is more convenient, less burdensome and less expensive.
4. Plaintiff has had ample opportunity to obtain the information by discovery in the action.
5. The subpoena subjects the nonparty to annoyance, embarrassment, oppression and undue burden.
6. Compliance is unreasonably expensive.
7. The subpoena is not proportional.

8. Plaintiff has not defrayed the expense of compliance, including reasonable attorneys' fees.
9. The proposed discovery is otherwise outside the scope permitted by Rule 26.

Dated: New York, New York
September 28, 2023

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Nonparty Madeline Cuomo

By: 
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